

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: December 12, 2024 at 1:00 p.m. ET

**NOTICE OF DEBTORS' EXHIBIT LIST AND INTENT TO OFFER
WITNESS TESTIMONY AT THE HEARING ON DECEMBER 12, 2024 REGARDING
THE MOTION OF DEBTORS FOR ENTRY OF AN ORDER ESTABLISHING
THE AMOUNT OF THE DISPUTED CLAIMS RESERVE**

PLEASE TAKE NOTICE that FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby provide the following information regarding the witnesses that they intend to present, and the list of the potential exhibits that they may seek to introduce, at the hearing scheduled on December 12, 2024 (the “Hearing”) regarding the *Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve* [D.I. 28102] (the “Motion”).

INFORMATION ON WITNESS STEVEN P. COVERICK

1. Mr. Coverick is Managing Director at Alvarez & Marsal North America, LLC, financial advisors to the Debtors.
2. Mr. Coverick will be attending the Hearing and available to testify in person. The content of Mr. Coverick’s direct testimony is set forth in the *Declaration of Steven P. Coverick in Support of the Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve* [D.I. 28103] (the “Coverick Declaration”). The Debtors may elicit additional direct or rebuttal testimony from Mr. Coverick at the Hearing.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

EXHIBITS

In connection with the Hearing, the Debtors may seek to use any one or more of the following documents:

Ex. #	Description
1.	<i>Declaration of Steven P. Coverick in Support of the Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve [D.I. 28103]</i>
2.	<i>Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates [D.I. 26404]</i>
3.	<i>Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates [D.I. 26404-1]</i>
4.	<i>Disclosure Statement for Debtors' Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Affiliated Debtors and Debtors-in-Possession [D.I. 19143]</i>
5.	Any rebuttal or impeachment exhibits

RESERVATION OF RIGHTS

The Debtors reserve all rights to: (i) amend and supplement this exhibit and witness list at any time at or prior to the Hearing; (ii) use additional exhibits for purposes of rebuttal or impeachment and to supplement the foregoing exhibit list as appropriate; (iii) rely upon and use as evidence (a) any exhibits included on the exhibit lists of any other party in interest and (b) any pleading, hearing transcript, order, or other document filed with the Court in these Chapter 11 Cases or any adversary proceeding; (iv) cross examine any and all witnesses proffered at the Hearing; and (v) call any rebuttal witnesses as the Debtors may deem necessary at the Hearing.

Dated: December 10, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Benjamin S. Beller (admitted *pro hac vice*)
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
bellerb@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession